Randall S. Cavanaugh KALAMARIDES & LAMBERT 711 H Street, Suite 450 Anchorage, AK 9951 P: (907) 276-2135 F: (907- 278-8514

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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,	
Plaintiff,) Case No. 3:03-cr-00088-RRB-4
V.) MOTION FOR DISCOVERY) FILED ON SHORTENED TIME
IRIS BINGHAM,)
Defendant.)))

COMES NOW the Defendant, Iris Bingham, by and through her attorney, Randall S. Cavanaugh of KALAMARIDES & LAMBERT, and hereby moves this court for an order for the United States probation/Pre-Trial Services and the United States Attorney's Office to provide discovery in the above-captioned matter. This includes a copy of any test results, notes kept by pretrial services that are going to be relied upon for the up coming evidentiary hearing. The hearing is set within the time of normal motion practice, a shortened time frame needs to be used.

DATED this 31st day of May, 2006, at Anchorage, Alaska.

KALAMARIDES & LAMBERT Attorneys for Defendant

By: /s/ Randall S. Cavanaugh

Randall S. Cavanaugh, ABA #8812215 KALAMARIDES & LAMBERT

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CERTIFICATE OF SERVICE

The undersigned hereby certifies, pursuant to App. R. 513.5, that the font used in the aforementioned documents was Times New Roman 13 point. I further certify that a true and correct copy of the foregoing was served via **electronic mail** this 31st day of May, 2006, on:

Assistant U.S. Attorney Federal Building & U.S. Courthouse 222 West 7th Avenue, #9, Room 253 Anchorage, AK 99513

/s/ Randall S. Cavanaugh

Kalamarides & Lambert

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